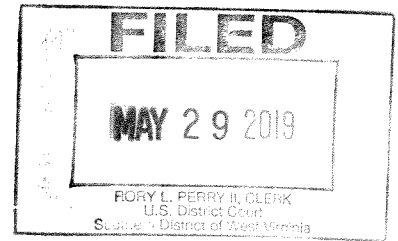


SEALED

UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON GRAND JURY 2018-1
MAY 29, 2019 SESSION



UNITED STATES OF AMERICA

v.

CRIMINAL NO.

2:19-cr-00143

JALEN WOOLRIDGE

21 U.S.C. § 841(a)(1)

18 U.S.C. § 922(g)(1)

18 U.S.C. § 924(a)(2)

18 U.S.C. § 924(c)(1)(A)

I N D I C T M E N T

The Grand Jury Charges:

COUNT ONE

(Possession with Intent to Distribute a Quantity of Heroin)

On or about December 20, 2018, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant JALEN WOOLRIDGE knowingly and intentionally possessed with intent to distribute a quantity of heroin, a Schedule I controlled substance.

In violation of Title 21, United States Code, Section 841(a)(1).

COUNT TWO

**(Use and Carry a Firearm During and in Relation to a Drug
Trafficking Crime)**

On or about December 20, 2018, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant JALEN WOOLRIDGE did knowingly use and carry a firearm, that is, a Smith & Wesson M&P 9mm pistol, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, that is, possession with intent to distribute a quantity of heroin, a Schedule I controlled substance, in violation of 21 U.S.C. § 841(a)(1).

In violation of Title 18, United States Code, Section 924(c)(1)(A).

COUNT THREE
(Felon in Possession of a Firearm)

1. On or about December 20, 2018, at or near Charleston, Kanawha County, West Virginia, and within the Southern District of West Virginia, defendant JALEN WOOLRIDGE did knowingly possess a firearm, that is, a Smith & Wesson M&P 9mm pistol, in and affecting interstate commerce.

2. At the time defendant JALEN WOOLRIDGE possessed the aforesaid firearm, he knew he had been convicted of a crime punishable by a term of imprisonment exceeding one year, as defined in 18 U.S.C. § 921(a)(20), that is, convicted on or about April 16, 2012, in the State of Michigan, 6th Judicial Circuit, County of Oakland, of Armed Robbery, in violation of Mich. Comp. Laws § 750.529.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

NOTICE OF FORFEITURE

In accordance with 28 U.S.C. § 2461(c), 21 U.S.C. § 853, 18 U.S.C. § 924(d)(1), and Rule 32.2(a) of the Federal Rules of Criminal Procedure, and premised upon the conviction of defendant JALEN WOOLRIDGE of a violation of 18 U.S.C. §§ 922(g)(1) and 924(a)(2) and 21 U.S.C. § 841(a)(1) as set forth in this Indictment, defendant JALEN WOOLRIDGE shall forfeit to the United States any firearm involved in or used in such offenses, including, but not limited to, a Smith & Wesson M&P 9mm pistol, serial number HPS9536, seized by police on or about December 20, 2018.

MICHAEL B. STUART
United States Attorney

By:


Ryan A. Saunders
Assistant United States Attorney